

## STATEMENT OF BASIS

as required by LAC 33:IX.3109, for draft **Louisiana Pollutant Discharge Elimination System Permit No. LA0065102; AI 19264; PER20060001** to discharge to waters of the **State of Louisiana** as per LAC 33:IX.2311.

The **permitting authority** for the Louisiana Pollutant Discharge Elimination System (LPDES) is:

Louisiana Department of Environmental Quality  
Office of Environmental Services  
P. O. Box 4313  
Baton Rouge, Louisiana 70821-4313

- I.      **THE APPLICANT IS:**      Village of Simsboro  
   Simsboro Wastewater Treatment Facility  
   P.O. Box 40  
   Simsboro, LA 71275
  
- II.     **PREPARED BY:**            Ronda Burtch
  
- DATE PREPARED:**        February 28, 2007
  
- III.    **PERMIT ACTION:**        reissue LPDES permit LA0065102, AI 19264; PER20060001
  
- LPDES application received: September 29, 2006
  
- LPDES permit issued: April 1, 2002
- LPDES permit expired: March 31, 2007

### IV.      **FACILITY INFORMATION:**

- A.    The application is for the discharge of treated sanitary wastewater from a publicly owned treatment works serving the Village of Simsboro.
  
- B.    The permit application does not indicate the receipt of industrial wastewater.
  
- C.    The facility is located about 0.75 miles south of the intersection of Hwy. 80 and Hwy. 507 to Best Road, turn left and go about 0.38 miles to the access road in Simsboro, Lincoln Parish.
  
- D.    The treatment facility consists of a three-cell unmixed stabilization pool system using step type aerobic stabilization process and a 110,000 gallon per day wastewater treatment package plant. Disinfection is by chlorination.
  
- E.    **Outfall 001**

Discharge Location:      Latitude 32° 31' 04" North  
   Longitude 92° 47' 25" West

Description:                treated sanitary wastewater

Design Capacity:         0.110 MGD

Type of Flow Measurement which the facility is currently using:

**According to Chris Harris, certified operator for the Village of Simsboro, there is a continuous recorder on the influent side and a v-notch weir on the effluent side of the treatment facility. However, Chris Harris and Mayor Hendricks have been notified that a continuous recorder will need to be installed on the effluent side of the treatment facility. They have agreed to install a continuous recorder on the effluent side of the treatment facility. LDEQ will be notified when the continuous recorder has been installed.**

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#### **V. RECEIVING WATERS:**

The discharge is into an unnamed ditch, thence into Madden Creek, thence into the Dugdemona River in segment 081401 of the Ouachita River Basin. This segment is not listed on the 303(d) list of impaired waterbodies.

The designated uses and degree of support for Segment 081401 of the Ouachita River Basin are as indicated in the table below<sup>1/</sup>:

Overall Degree of Support for Segment 081401	Degree of Support of Each Use						
	Primary Contact Recreation	Secondary Contact Recreation	Propagation of Fish & Wildlife	Outstanding Natural Resource Water	Drinking Water Supply	Shellfish Propagation	Agriculture
Full	Full	Full	Full	N/A	N/A	N/A	N/A

<sup>1/</sup>The designated uses and degree of support for Segment 081401 of the Ouachita River Basin are as indicated in LAC 33:IX.1123.C.3, Table (3) and the 2004 Water Quality Management Plan, Water Quality Inventory Integrated Report, Appendix A, respectively.

#### **VI. ENDANGERED SPECIES:**

The receiving waterbody, Subsegment 081401 of the Ouachita River Basin, is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U. S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated September 29, 2006 from Watson (FWS) to Brown (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. It was determined that the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat.

#### **VII. HISTORIC SITES:**

The discharge is from an existing facility location, which does not include an expansion beyond the existing perimeter. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the 'Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits' no consultation with the Louisiana State Historic Preservation Officer is required.

#### **VIII. PUBLIC NOTICE:**

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit modification and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

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Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

For additional information, contact:

Ms. Ronda Burtch  
 Permits Division  
 Department of Environmental Quality  
 Office of Environmental Services  
 P. O. Box 4313  
 Baton Rouge, Louisiana 70821-4313

#### IX. PROPOSED PERMIT LIMITS:

Subsegment 081401, Dugdemona River – Headwaters to junction with Big Creek, is not listed on LDEQ's Final 2004 303(d) List as impaired, and to date no TMDLs have been established. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by any future TMDLs.

#### Final Effluent Limits:

##### OUTFALL 001

Final limits shall become effective on the effective date of the permit and expire on the expiration date of the permit.

Effluent Characteristic	Monthly Avg (lbs./day)	Monthly Avg	Weekly Avg	Basis
BOD <sub>5</sub>	9	10 mg/l	15 mg/l	Limits are set in accordance with the Statewide Sanitary Effluent Limitations Policy (SSELP) for facilities of this treatment type and size.
TSS	14	15 mg/l	23 mg/l	TSS effluent limitations shall be based on a case-by-case evaluation of the treatment technology being utilized at a facility. Therefore, a Technology Based Limit has been established through Best Professional Judgement for the type of treatment technology utilized at this facility.

#### Other Effluent Limitations:

##### 1) Fecal Coliform

The discharge from this facility is into a water body which has a designated use of Primary Contact Recreation. According to LAC 33:IX.1113.C.5.b.i, the fecal coliform standards for this water body are

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200/100 ml and 400/100 ml. Therefore, the limits of 200/100 ml (Monthly Average) and 400/100 ml (Weekly Average) are proposed as Fecal Coliform limits in the permit. These limits are being proposed through Best Professional Judgement in order to ensure that the water body standards are not exceeded, and due to the fact that existing facilities have demonstrated an ability to comply with these limitations using present available technology.

**2) pH**

According to LAC 33:IX.3705.A.1., POTW's must treat to at least secondary levels. Therefore, in accordance with LAC 33:IX.5905.C., the pH shall not be less than 6.0 standard units nor greater than 9.0 standard units at any time.

**3) Solids and Foam**

There shall be no discharge of floating solids or visible foam in other than trace amounts in accordance with LAC 33:IX.1113.B.7.

**X. PREVIOUS PERMITS:**

**LPDES Permit No. LA0065102:** Issued: April 1, 2002  
 Expired: March 31, 2007

<u>Effluent Characteristic</u>	<u>Discharge Limitations</u>		<u>Monitoring Requirements</u>	
	<u>Daily Avg.</u>	<u>Daily Max.</u>	<u>Measurement Frequency</u>	<u>Sample Type</u>
Flow	Report	Report	Continuous	Recorder
BOD <sub>5</sub>	10 mg/l	15 mg/l	2/month	Grab
TSS	15 mg/l	23 mg/l	2/month	Grab
Fecal Coliform Colonies	200	400	2/month	Grab

The permit contains pollution prevention language.

**XI. ENFORCEMENT AND SURVEILLANCE ACTIONS:**

**A) Inspections**

A review of the files indicates the following inspection was performed during the period beginning January 9, 2005 and ending January 9, 2007 for this facility.

Date: September 27, 2005

Inspector: LDEQ

Findings and/or Violations:

1. The permittee did not allow this inspector, upon the presentation of credentials to have access to and copy records that must be kept under the conditions of the permit, or inspect the facility equipment practices and operation.
2. A facility representative familiar with provisions of its wastewater discharge permit was not available; whereas, the initiation of the inspection was delayed due to the situation described in Part III, Section C.1.b.

**B) Compliance and/or Administrative Orders**

A review of the files indicates that there are no recent enforcement actions administered against this facility.

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### C) DMR Review

A review of the discharge monitoring reports for the period beginning September 1, 2004 through September 30, 2006 has revealed the following violations:

Month	Parameter	DMR Reported Value	Permit Limit
October 2004	TSS, Monthly Avg.	39 mg/l	15 mg/l
	TSS, Weekly Avg.	64 mg/l	23 mg/l
November 2004	BOD <sub>5</sub> , Monthly Avg.	11.1 mg/l	10 mg/l
	BOD <sub>5</sub> , Weekly Avg.	15.7 mg/l	15 mg/l
December 2004	Fecal Coliform, Weekly Avg.	>800 col/100 ml	400 col/100 ml
January 2005	BOD <sub>5</sub> , Monthly Loading	23.24 lb/day	10 lb/day
	BOD <sub>5</sub> , Monthly Avg.	26.85 mg/l	10 mg/l
	BOD <sub>5</sub> , Weekly Avg.	33.30 mg/l	15 mg/l
	TSS, Monthly Avg.	17.85 mg/l	15 mg/l
February 2005	BOD <sub>5</sub> , Monthly Loading	11.18 lb/day	10 lb/day
	BOD <sub>5</sub> , Monthly Avg.	10.95 mg/l	10 mg/l
	BOD <sub>5</sub> , Weekly Avg.	17 mg/l	15 mg/l
March 2005	TSS, Monthly Loading	Not Reported	16 lb/day
May 2005	TSS, Weekly Avg.	28 mg/l	23 mg/l
December 2005	TSS, Monthly Avg.	37.5 mg/l	15 mg/l
	TSS, Weekly Avg.	74 mg/l	23 mg/l
January 2006	TSS, Monthly Loading	20.04 lb/day	16 lb/day
	TSS, Monthly Avg.	37.2 mg/l	15 mg/l
	TSS, Weekly Avg.	56.4 mg/l	23 mg/l
March 2006	TSS, Monthly Avg.	21 mg/l	15 mg/l
	TSS, Weekly Avg.	34 mg/l	23 mg/l
	Fecal Coliform, Weekly Avg.	470 col/100 ml	400 col/100 ml
May 2006	TSS, Monthly Avg.	20.35 mg/l	15 mg/l
June 2006	BOD <sub>5</sub> , Monthly Loading	18.18 lb/day	10 lb/day
	BOD <sub>5</sub> , Monthly Avg.	24.70 mg/l	10 mg/l
	BOD <sub>5</sub> , Weekly Avg.	33.30 mg/l	15 mg/l
	TSS, Monthly Loading	36.06 lb/day	16 lb/day
	TSS, Monthly Avg.	49 mg/l	15 mg/l
	TSS, Weekly Avg.	64 mg/l	23 mg/l
July 2006	BOD <sub>5</sub> , Monthly Avg.	10.3 mg/l	10 mg/l

### XII. ADDITIONAL INFORMATION:

The Department of Environmental Quality reserves the right to impose more stringent discharge limitations and/or additional restrictions in the future to maintain the water quality integrity and the designated uses of the receiving water bodies based upon water quality studies. These studies may indicate the need for **advanced/more advanced** wastewater treatment. Studies of similar dischargers and receiving water bodies have resulted in monthly average effluent limitations of 5 mg/l CBOD<sub>5</sub>, and 2 mg/l NH<sub>3</sub>-N. Therefore, prior to upgrading or expanding this facility, the permittee should contact the Department to determine the status of the work being done to establish future effluent limitations and additional permit conditions.

Final effluent loadings (i.e. lbs/day) have been established based upon the permit limit concentrations and the design capacity of 0.110 MGD.

Effluent loadings are calculated using the following example:

$$\text{BOD: } 8.34 \text{ lb/gal} \times 0.110 \text{ MGD} \times 10 \text{ mg/l} = 9 \text{ lb/day}$$

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At present, the **Monitoring Requirements, Sample Types, and Frequency of Sampling** as shown in the permit are standard for facilities of flows between 0.10 and 0.50 MGD.

<u>Effluent Characteristics</u>	<u>Monitoring Requirements</u>	
	<u>Measurement Frequency</u>	<u>Sample Type</u>
Flow	Continuous	Recorder
BOD <sub>5</sub>	2/month	Grab
Total Suspended Solids	2/month	Grab
Fecal Coliform Bacteria	2/month	Grab
pH	2/month	Grab

### **Pretreatment Requirements**

Based upon consultation with LDEQ pretreatment personnel, general pretreatment language will be used due to the lack of either an approved or required pretreatment program.

### **Pollution Prevention Requirements**

The permittee shall institute or continue programs directed towards pollution prevention. The permittee shall institute or continue programs to improve the operating efficiency and extend the useful life of the facility. The permittee will complete an annual Environmental Audit Report **each year** for the life of this permit according to the schedule below. The permittee will accomplish this requirement by completing an Environmental Audit Form which has been attached to the permit. All other requirements of the Municipal Wastewater Pollution Prevention Program are contained in Part II of the permit.

The audit evaluation period is as follows:

<b>Audit Period Begins</b>	<b>Audit Period Ends</b>	<b>Audit Report Completion Date</b>
Effective Date of Permit	12 Months from Audit Period Beginning Date	3 Months from Audit Period Ending Date

### **XIII TENTATIVE DETERMINATION:**

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to reissue a permit for the discharge described in this Statement of Basis.

### **XIV REFERENCES:**

Louisiana Water Quality Management Plan / Continuing Planning Process, Vol. 8, "Wasteload Allocations / Total Maximum Daily Loads and Effluent Limitations Policy," Louisiana Department of Environmental Quality, 2005.

Louisiana Water Quality Management Plan / Continuing Planning Process, Vol. 5, "Water Quality Inventory Section 305(b) Report," Louisiana Department of Environmental Quality, 1998.

Louisiana Administrative Code, Title 33 - Environmental Quality, Part IX - Water Quality Regulations, Chapter 11 - "Louisiana Surface Water Quality Standards," Louisiana Department of Environmental Quality, 2004.

Louisiana Administrative Code, Title 33 - Environmental Quality, Part IX - Water Quality Regulations, Subpart 2 - "The LPDES Program," Louisiana Department of Environmental Quality, 2004.

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Low-Flow Characteristics of Louisiana Streams, Water Resources Technical Report No. 22, United States Department of the Interior, Geological Survey, 1980.

Index to Surface Water Data in Louisiana, Water Resources Basic Records Report No. 17, United States Department of the Interior, Geological Survey, 1989.

LPDES Permit Application to Discharge Wastewater, Village of Simsboro, Simsboro Wastewater Treatment Facility, September 29, 2006.